

December 22, 1986

Mr. M. L. Mullins
Monsanto Company
900 N. Lindbergh Boulevard
St. Louis, Missouri 63167

Dear Mr. Mullins:

This is in response to your letter of September 29, 1986, in which you requested confirmation that disposal (by incineration) is appropriate for unregulated dioxin-containing wastes. Unregulated forms of dioxin-containing waste refers to those wastes which contain dioxin but are not explicitly covered by EPA Hazardous Waste Nos. F020-F023 and F026-F028. These wastes, although containing dioxin, would not be a hazardous waste and therefore would not be subject to the RCRA Subtitle C regulations if they do not meet the listing description or do not exhibit a characteristic of a hazardous waste. Even though these wastes may not be subject to Subtitle C control, they are toxic and care should be taken in their management. High temperature incineration, such as would be achieved at the Rollins Facility in Deer Park, would be an appropriate means of disposal.

At this time, we are unable to give you a final answer to your second question which requested clarification as to the regulatory status of lab wastes, such as glassware, gloves, filter paper, GC columns, etc., which have been exposed to the listed dioxin-containing wastes. However, we should be able to respond to this issue shortly after the 1st of the year.

I hope this adequately answers your inquiry. If you have any further questions, please contact Dr. Doreen Sterling (202-475-6775) of my staff.

Sincerely,

Matthew A. Straus, Chief
Waste Characterization Branch

cc: Paul E. DesRosiers
Howard Fribush
Doreen Sterling

Faxback 11208

September 29, 1986

Mr. Matt Strauss
Office of Solid Waste
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Dear Mr. Strauss:

Monsanto company has accumulated laboratory wastes at St. Louis and Dayton, Ohio locations resulting from analysis of both regulated and unregulated forms of dioxin-containing wastes. We have requested that Rollins Environmental Services disposal of the unregulated portion of these wastes and Rollins has requested an EPA verification that such disposal (by incineration) is appropriate (see attached letter).

It is requested, therefore, that such a letter be provided.

Secondly, we would appreciate your interpretation of the lab wastes resulting from analysis of regulated wastes. These wastes consist of glassware, gloves, filter paper, GC columns, etc., all of which have been exposed to F020-28 wastes during the analytical process. Very minor amounts of contaminated soil with PPB concentrations of dioxin are involved. As you know, there is currently no way of disposing of such waste if it is considered F020-28 itself. Is there any de minimis exemption for such lab waste that would allow it to be incinerated as non-regulated? We would appreciate your guidance on this as we are typing up valuable lab space with drums of such material.

Sincerely,

M. L. Mullins
Director, Regulatory Management

mo
Att.

Date: November 5, 1986

Subject: Materials for Disposal

Reference: M. L. Mullins ADMA2 opr 18

As requested, I have compiled a list of the materials which the Ultratrace Analysis Group of Monsanto Environmental Sciences Center has analyzed and these analyses have resulted in material of which we wish to dispose (Category 2).

Air Filter Samples

Water Samples

Soil Samples

Sediment Samples

Wipes from plant buildings

Wipes from Ultratrace laboratories

Fish Samples

Human autopsy samples - adipose, mesentery and liver tissues.

2,4 Dichlorophenol

2,4 Dichlorophenoxyacetic acid, sodium salt, isobutyl ester and
isopropyl amine salt

Monochlorophenoxyacetic acid

Dicamba - 3, 6-Dichloro-2-methoxybenzoic acid

Dachthal-Tetrachloro-p-terphthalic acid dimethyl ester

Tetrathal-Tetrachlorophthalic anhydride

Landmaster 1/2/Tillmaster 1/4 - mixtures of Roundup 1/4 and
2, 4-dichlorophenoxyacetic acid ester

Alkylbenzenes

Stantophen - Orthobenzyl -p-chlorophenol

Polyphenylethers

Orthochlorophenol

Chloranil- Tetrachloro-p-benzoquinone

This list does not include soil from sites where tri-and higher chlorophenol were manufactured, these materials are listed as a separate category (Category 3).

REVISED ELECTRONIC MAIL (11 am)

August 25, 1986

Mr. A. J. Heinze
Monsanto Co.
800 North Lindbergh
St. Louis, Missouri 63167

RE: Your letter dated 8/15/86 requesting consideration of disposal of non-regulated dioxin wastes.

Dear Mr. Heinze:

Rollins Environmental Services (TX) Inc. will consider disposal of the referenced wastes under the following conditions:

- 1) Monsanto provide written certification that the waste is non-regulated as referenced by the F020 through F028 listed wastes.

Monsanto provide written approval by the EPA responsible authority that the material may be incinerated at the Rollins Environmental Services (TX) Inc. facility located at 2027 Battleground Road, Deer Park, Texas, 77536, EPA Permit Number TXD 055 141378; and may be transported by C.E.T. Inc. located at 7200 Rollins Road, Deer Park, Texas, Permit Number DED 98091 8858.

Upon receipt of the above, Rollins Environmental Services (TX) Inc. will give consideration for approval.

Contact me if there are any questions.

Sincerely,
ROLLINS ENVIRONMENTAL SERVICES (TX) INC.

W.F. Bradbury
National Accounts Executive

WFB/jh